

Suffolk County Council’s Energy, Water, Commercial, Transport and Adaptive Infrastructure Policy 2026

Scope and purpose of the Policy

Suffolk has specific natural and geographic advantages which make it very attractive for the promoters of offshore wind, solar and battery storage projects to site their projects here. Suffolk has established industries, nuclear, offshore gas logistics and agri-tech, and hosts new nuclear, hydrogen production and anaerobic digestion. The continuing commitment of the government to the delivery of Net Zero¹ in the UK by 2050 requires multiple energy generation and connection projects in Suffolk.

In addition, these energy projects can also be expected to make the county attractive to major new commercial energy consumers, such as data centres and controlled environment farming, particularly in locations that are well connected to the Oxford - Cambridge Growth Corridor, it is also anticipated nationally significant road schemes will be required to support this after 2030. Taken together, these new infrastructure projects ensure that significant changes for the economy, environment and communities of Suffolk can be expected.

Finally, Suffolk, in common with the other parts of East Anglia, faces very significant challenges in relation to both the availability of water, and the impacts of rising sea levels. These issues present significant challenges for the economy, environment, and communities of Suffolk, now, and in the future. Therefore, there are now an emerging series of proposals for coastal defence and re-alignment, water recycling and pipelines, reservoirs, and desalination plants, that will be required to mitigate these issues.

The purpose of this policy is to outline how, in principle, the Council will engage and influence other parties to ensure adverse impacts to our communities are understood and addressed by future decisions.

The role of Suffolk County Council

The County Council tends not to be the decision maker. It is not the decision maker for Nationally Significant Infrastructure Projects (NSIP), or energy projects consented under the Electricity Act 1989, or water related projects. Unless they are connected to minerals or waste, including the management and processing of sewage, or reservoirs created through mineral extraction, or the County Council’s own development, both water and energy projects would be determined by district or borough councils under the Town and Country Planning Act 1990. The County Council is, however, a key statutory consultee, and its view carries significant weight with the Examining Authority, (ExA) and by extension, the Secretary of State (SoS). Particularly because it has responsibility for a wide range of interlocking issues

¹ The Climate Change Act 2008 (2050 Target Amendment) Order 2019
<http://www.legislation.gov.uk/ukxi/2019/1056/contents/made>

across the whole county, which affect decision making, having a key role in representing, developing, and supporting, its local communities and protecting their environment.

The Council also has specific responsibilities to maintain the highway network and its structures. The capacity of these structures is challenged by the significant additional traffic and abnormal Loads generated by multiple major infrastructure projects.

The Council is an established NSIP Centre of Excellence and has been prominent in seeking to shape the thinking of successive governments on infrastructure matters. The Council continues to engage with government, including at ministerial level, and has been forthright in underlining the importance of effective engagement with communities during the early development of major infrastructure projects.

The need for the Policy

a) To demonstrably recognise that, given Suffolk's locational and other advantages, infrastructure which has been promoted nationally² and internationally as a key strand of economic development, are a key element of Suffolk's current and future economic growth.

b) To demonstrably recognise that Suffolk faces specific challenges, which will need to be effectively and robustly addressed to support the economy, whilst protecting and enhancing the communities and environment of Suffolk.

c) To manage the impact of infrastructure projects, on the environment and our communities, arising not only from the construction and operation of a project alone, but from the in-combination and cumulative effects of overlapping and consecutive projects.

c) To give the Council the best opportunity to influence the provision of new infrastructure, to ensure that the benefits for Suffolk's communities are maximised, whilst minimising the adverse impacts on them.

d) To seek to maximise the benefits of economic growth, skills, and STEM (Science Technology Engineering and Maths) educational inspiration, from energy and infrastructure projects, for the communities of Suffolk, to support the long-term economic growth of the area.

e) To provide other local authorities, energy, water and commercial project promoters, Government, and the public, with a clear understanding of the position of the Council in relation to energy and infrastructure projects, and the policy and process that will guide the Council's response to specific proposals.

² Policy paper British energy security strategy <https://www.gov.uk/government/publications/british-energysecurity-strategy/british-energy-security-strategy>

f) To ensure that such schemes fully and appropriately consider the character, function and sensitivity of the natural and historic environment and landscape of the county.

Relationships to the Council's strategic priorities

The Council's **Carbon Budget** and supporting paper, approved at Cabinet on 27th January 2026³, revised the council's expected **decarbonisation trajectory** to focus on the period through to the end of 2027/28 and elaborated on the council's policy to decarbonise on a "spend to save basis" to ensure projects are only funded where in-year savings exceed the annual cost of borrowing to deliver the scheme.

The expansion of renewable and low carbon energy offers significant opportunities to drive the Council's priority to **Strengthen the Local Economy**, which it recognises as a key priority⁴ to unlock potential and improve people's quality of life. The active delivery of net zero by the Council will support opportunities for employment and training, providing more highly skilled jobs with increased wage and productivity levels for our communities, whilst safeguarding Suffolk's natural and historic environment by contributing to **climate change adaptation**. This will help maximise the benefits our environment provides to our economic growth, health, and wellbeing, now and for future generations.

The Council recognises the requirement to **develop the skills needed for future growth**, as set out in the **Suffolk Economic Strategy**⁵. The Council will support employers to train people in the skills their sectors need, continue our ambitious Apprenticeships Suffolk programme, and work with employers to create more start-up businesses.

The Council's **Local Transport Plan**⁶ articulates the long-term vision and provides a set of objectives that will inform transport policy and investment decisions in Suffolk up to 2040. Our Local Transport Plan provides essential policy direction that informs plans for growth, development and the decarbonisation of transport.

The Council understands that delivering its policy priorities around the local economy and skills can also directly support another priority in **Protecting and Enhancing Our Environment**. As outlined in the **Corporate Strategy 2022- 26**⁵, the Council recognises that, *"Suffolk's environment is one of its greatest strengths. It is why so many people enjoy living and working in Suffolk as well as visiting our great county. Suffolk's environment also makes a significant economic contribution as a leader in green growth with its renewables and technology sectors. The county council has*

³ [https://committeeminutes.suffolk.gov.uk/DocSetPage.aspx?MeetingTitle=\(27-01-2026\),%20The%20Cabinet](https://committeeminutes.suffolk.gov.uk/DocSetPage.aspx?MeetingTitle=(27-01-2026),%20The%20Cabinet)

⁴ Suffolk County Council Corporate Strategy 2022 - 26 <https://www.suffolk.gov.uk/assetlibrary/imported/master-corp-strategy-report-2022-26.pdf>

⁵ <https://suffolkeconomy.co.uk/economic-strategy/>

⁶ <https://www.suffolk.gov.uk/roads-and-transport/transport-planning/suffolks-local-transport-plan-2025-2040>

declared a climate emergency and recognises both the urgency for action and the scale of the challenge to becoming carbon neutral. We will continue to change our own approaches to progress to net zero, and work to encourage others' behaviour changes. Both are needed to protect and enhance Suffolk's environment and biodiversity."

The role of project promoters

The promoters of energy and water management projects should be responsible corporate entities interested in achieving positive outcomes. National Grid for example, has published a Responsible Business Charter⁷ that includes designing assets to avoid waste. There is likely to be a high degree of alignment between corporate objectives and the achievement of benefits beyond those that are needed to mitigate the impact of the project. Just as there is an expectation that Suffolk County Council justifies why infrastructure improvements, environmental or other conditions are necessary to mitigate impact, promoters should demonstrate from the outset how they are addressing benefits that align with community needs, as well as their own corporate priorities.

Promoters should be seeking to deliver inclusive growth through working with partners, such as Suffolk County Council⁸, to identify and deliver additional social value. National toolkits, frameworks, and individual case studies, such as those available through the Social Value Portal⁹, could assist with this process and the measurement of outcomes. A skills programme for example, could be achieving a reduction in long-distance commuting, supporting other businesses, as well as reducing health inequalities.

If a promoter does not have a clear set of corporate responsibilities, then the willingness to deliver social and environmental objectives, including those necessary to mitigate impact, will be a critical matter to resolve. The willingness of the promoter to work with authorities, not just on the mitigation of the direct impacts, but also the integration of their projects into the community, should be an element that promoters look to address during the early stages of consultation¹⁰.

Promoters should therefore approach communities with a clear rationale of delivering on a range of objectives as part of their project. There might not be perfect alignment between the priorities the promoters outline and those of Suffolk County Council, or even those of the communities. However, by exploring the full extent of potential partnerships at an early stage, promoters will significantly reduce the risks of managing potentially competing demands, and any resultant obligations will be full

⁷ National Grid Responsible Business Charter 2020

<https://www.nationalgrid.com/document/134426/download>

⁸ <https://www.suffolk.gov.uk/business/tenders-and-supplying-us/social-value>

⁹ Social value Portal <https://socialvalueportal.com/>

¹⁰ Community Engagement and Wellbeing Supplementary Guidance Document

<https://www.suffolk.gov.uk/asset-library/community-engagement-and-wellbeing-policy.pdf>

and active commitments, clearly supported by both the promoter and the other parties.

Energy, Water, Commercial, Transport and Adaptive Infrastructure Policy

Suffolk County Council recognises that significant new infrastructure is required to ensure energy security, deliver growth, transport resilience, jobs and prosperity, and adapt to the challenges of a changing climate faced by the UK, and the communities and environment of Suffolk.

However, projects will not be supported unless the harms of the project alone, as well as cumulatively and in combination with other projects, are adequately recognised, assessed, appropriately mitigated, and, if necessary, compensated for.

Priority setting

The County Council will identify its initial strategic priorities in relation to individual infrastructure projects coming forward, to help inform the development of those projects, and give clarity to developers, communities, and other parties. Those priorities will be kept under review as proposals are clarified and refined, or new information becomes available.

The County Council will review the effectiveness of its engagement with a project, against these priorities. And it will evaluate the balance of harm and benefit, against these priorities, as the project progresses through the consenting process.

Skills and growth

The Council expects to have comprehensive and effective engagement with developers and their supply chain partners, to maximise the local business opportunity, skills inspiration, and employment benefits. Wherever appropriate, the Council and developers should promote synergies between projects that enhance these benefits, deliver growth, and attract inward investment.

Suffolk, with the approval of Sizewell C now given, will be home to the UK's foremost operational nuclear cluster. The Council will leverage this opportunity for economic growth and maximise the opportunity for Suffolk's supply chain and workforce in the operation and maintenance of nuclear facilities in the UK, and ensure those surrounding communities, who will bear the disruption of a twelve year construction period, receive in full, the mitigation measures specified in the consent, and, all other measures agreed in the deed of obligation, and elsewhere, by SZC Ltd.

The Council will continue working actively with those driving forward new infrastructure, (developers, owners or operators and associated supply chains), Government, and regulators, to facilitate the delivery of the policy, that seeks to ensure the use of best available techniques, to maximise the development of skills, employment, and educational inspiration in Suffolk. The objective being to create a relevantly skilled

talent pool, that can take advantage of the opportunities presented by a succession of infrastructure projects. The Council expects that individual promoters will contribute to the delivery of these goals in Suffolk, looking to align the achievement of local priorities with their own, going beyond the minimum measures necessary to mitigate the clearly defined impacts of their project. This process should result in measurable outcomes that, for example, deliver social value.

The Council will continue to review and, where necessary, improve local structures and governance to support the development of skills, business growth, employment, and educational inspiration, to ensure that the necessary and appropriate business support, skills, and workforce are available so that employment opportunities provided by projects are secured locally.

Local energy security, and resilience to a changing climate

The Council will expect projects to deliver appropriate community benefit schemes in addition to the necessary compensation and mitigation, including schemes that support the decarbonisation of heat and transport, reduce energy poverty, and improve the climate adaptive resilience of both the natural environment and communities.

Relationship with the environment

Project promoters should recognise from the outset, that the large scale of many infrastructure proposals means that they will conflict with the character and the sensitivities of Suffolk's natural and historic environment, which underpins key economic sectors in Suffolk, and is central to the sense of place of our communities.

The harm to the environment and communities will arise both from the construction and operation of the promoter's project itself, and from its in combination and cumulative effects with overlapping and consecutive projects. The Council will expect promoters to develop a demonstrable understanding of the wider development environment for their project, and to work with the Council and other promoters to manage and mitigate these impacts.

The Council expects that project promoters will collaborate to minimise the construction impacts of their projects, coordinate development, and share infrastructure, to minimise the adverse cumulative and in combination effects of development on communities and the environment.

The Council will expect project promoters to minimise and mitigate any impacts. Where there is residual harm that cannot be mitigated, this must be appropriately compensated for.

Mitigation proposals should be robust and effective, they should be capable of being adapted, or responding, to the anticipated risks and impacts of the changing climate.

If the harm of a proposal is not properly and robustly addressed, the Council will not support the scheme, notwithstanding its national significance or its contribution to energy security, growth, or climate adaptive resilience.

The protection of agricultural land

For solar schemes, brownfield, rooftop, and around built infrastructure, such as warehousing, are the Council's preferred sites. Where solar or other large-scale schemes are proposed for agricultural land, developers should commission, independent land quality assessments to inform the Council's response to a proposal. The Council expects developers to ensure that their schemes do not remove grade 1 and 2, or extensive¹ areas of grade 3a land, from food productionⁱ¹¹.

Project promoters of all types of infrastructure should effectively ensure that the condition, soil health, productive capacity and drainage of all agricultural land impacted by the construction of their proposals is protected and restored.

Developers' engagement with communities

The Council will expect developers, and the wider sector, to work with community leaders and partners, to minimise and manage the impacts of both the individual project's construction and operation, and its cumulative and in combination effects with other concurrent and successive projects. The outcome of this engagement should be to ensure that wider community benefits, as well as the economic and social benefits of major infrastructure, are realised for the people of Suffolk.

Protection of community wellbeing during the consenting and construction of major infrastructure

The consenting and construction process results in significant adverse impacts on community wellbeing, particularly where multiple projects are being consulted on and consented across the same communities.

Therefore, it is essential for project promoters to engage effectively and collaboratively with communities. Project promoters must have consideration for the impacts of their project on community wellbeing, both alone and in combination with other proposals, during all phases of the project, from the earliest stages of the pre-application period, through consenting, and during construction.

Project promoters should recognise that distributional fairness, such as community benefits, or shared community ownership, are a necessary addition to, rather than a

¹¹ Considering issues such as, but not limited to, a) The percentage of the project area b) The area of any grade 3a land relative to Suffolk's estimated 3a resource. c) the use of agri-voltaic technologies. It is recognised that the balance of 3a versus 3b land can only be determined later during project development because of the limited detail of the DEFRA ALC.

substitute for, procedural fairness, which must be created through effective dialogue with the affected communities.

Highways Infrastructure, capacity and resilience

The Council expects developers to recognise the impacts of their project, in combination with other projects, on the highways network. The impact on bridges and other structures of construction traffic generally, and Abnormal Indivisible Loads in particular. Effective early engagement with both the Council, and other relevant project promoters is essential if safe and effective access to proposed sites is to be secured and maintained.

Developers' engagement with Suffolk County Council

The Council will expect developers to engage in effective pre-application discussion with the Council. The Council expects that the costs of its engagement throughout the consenting process will be covered under the terms of a Planning Performance Agreement. This will be on a full cost recovery basis, to ensure that local services, and local taxpayers, are not disadvantaged financially by the Council's engagement with project promoters.

Nationally Significant Energy, Water, Commercial Transport infrastructure in Suffolk

The Council recognises that Suffolk will play a very significant role in delivering the UK's energy security, supporting food security and adapting to a changing climate. The Council wishes to ensure that Suffolk can fulfil this role, both to support the national and local response to a changing climate, and to maximise opportunities for new and existing businesses and technologies in Suffolk.

Whilst recognising the importance of projects to deliver energy security, transport resilience, economic growth and adapt to the changing climate, the Council considers it is essential that projects do not lead to avoidable, unmitigated, or uncompensated detriment to the communities and environment of Suffolk, and its existing businesses.

The Council recognises that the infrastructure required to deliver energy security, economic growth and adapt to the changing climate, will result in significant change in some of the locations affected. It will work with developers, partners, and communities, to try to secure proposals that avoid, mitigate and, if necessary, compensate for these changes, for Suffolk's people and environment.

The status of supporting guidance for the previous Energy and Climate Adaptive Infrastructure Policy (2023)

This guidance, and any subsequent updates, remains in place to support this Energy, Water, Commercial and adaptive Infrastructure Policy.

